



Department of Toxic Substances Control



Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Edwin F. Lowry, Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Gray Davis
Governor

October 18, 2002

Mr. Eddie Fisher, President
LaBarron Investments
2020 East Orangethorpe Avenue
Fullerton, California 92831

REVIEW OF REVISED RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) FACILITY INVESTIGATION WORKPLAN FOR THE FORMER TRENT TUBE FACILITY, FULLERTON, CALIFORNIA.

Dear Mr. Fisher:

The Department of Toxic Substances Control (DTSC) has reviewed the revised RCRA Facility Investigation (RFI) Workplan dated October 15, 2002, for the former Trent Tube Facility. As per the phone conversation this morning between Evan Privett of Frey Environmental and Leona Winner with DTSC the two comment mentioned in the Industrial Hygiene Safety Branch's memorandum have been met and documentation is forth coming. DTSC conditionally approves the workplan, subject to the response to the comments in the enclosed memorandums from the Industrial Hygiene Safety Branch.

Field activities may commence on October 22, 2002. If you have any question or comments concerning this letter, please contact Ms. Leona Winner, Hazardous Substances Scientist, of my staff, at (916) 255-6679.

Sincerely,

Paul E. Ruffin, P.E.
Supervising Hazardous Substances Engineer I
Standardized Permits and Corrective Action Branch

Enclosures
See next page for cc:

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption.
For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at www.dtsc.ca.gov.*

Mr. Eddie Fisher
October 18, 2002
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cc: Mr. Evan Privett
Frey Environmental, Inc.
2817 A Lafayette Avenue
Newport Beach, California 92663

Ms. Mellan Songco
Industrial Hygiene Safety Branch
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, California 95826

Mr. Paul Carpenter
Geological Services Unit
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, California 95826

Mr. James Grace
Office of Legal Counsel
Department of Toxic Substances Control
1001 "I" Street
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MEMORANDUM

TO: Leona Winner
Hazardous Substances Scientist
Hazardous Waste Management Permitting Division
Standardized Permits – Corrective Actions

FROM: Mellan Songco *MSongco*
Associate Industrial Hygienist
Industrial Hygiene Safety Branch (IHSB)
Human and Ecological Risk Division (HERD)

DATE: October 17, 2002

SUBJECT: LA BARRON INVESTMENTS
RCRA Facility Investigation Workplan
Health and Safety Plan
Fullerton, California
PCA Code: 22120 Site Number: 400390-00

BACKGROUND

The Hazardous Waste Management Permitting Division in Sacramento sent a revised site health and safety plan for the Human and Ecological Risk Division (HERD) to review and comment. The revised HASP applies to the Resource Conservation and Recovery Act (RCRA) facility investigation (RFI) workplan for the La Barron Investments property (Site). The objective of the RFI activities is to assess the occurrence of petroleum hydrocarbons, aromatic and chlorinated hydrocarbons, and selected metals in subsurface soils and soil vapor beneath the Site.

The facility was constructed in the late 1950's by the Trent Tube Company and operated until 1984. Trent Tube manufactured stainless steel tubing, which required the use of numerous regulated chemicals including oil, kerosene, liquid ammonia, organic solvents, acids and pickle liquor.

The Site is covered with concrete with the exception of the southern-most area of the Site, which bounds Carbon Creek. Currently, the Site is used for the storage of recreational vehicles.

Work will include the following major activities:

- Core up to 17 four inch diameter cores through the concrete;
- Advance soil vapor probes and soil borings to depths ranging from 1 foot below the ground surface (bgs) to 10 feet bgs with a direct push drilling rig or hand operated auger;
- Collect soil and soil vapor samples at depths ranging from 1 to 10 feet bgs;
- Analyze soil and soil vapor samples for chlorinated aliphatic in an on-Site mobile laboratory. Submit soil samples for metals analyses to a stationary laboratory;
- Backfill each boring with bentonite powder;
- Resurface each borehole to match the surrounding surface.

DOCUMENTS REVIEWED

IHSB reviewed the RFI Workplan, Appendix A, Health and Safety Plan (HASP) for the La Barron Investments property (Site). FREY Environmental, Inc wrote the HASP dated October 15, 2002.

GENERAL COMMENTS

The Department of Toxic Substances Control (DTSC) reviewed the health and safety plan for compliance with Title 8, California Code of Regulations (T8 CCR), DTSC's policies and guidelines, and the NIOSH/OSHA/USCG/EPA Guidance Manual as well as other appropriate State and Federal Health and Safety Regulations. The review of the health and safety plan is not a guarantee that it will be properly and safely implemented; implementation is the employer's responsibility.

Federal Occupational Safety and Health Administration is the overall governing body for occupational safety and health, when a state approved program does not exist. In the State of California, there is a state approved OSHA plan. Therefore, Cal-OSHA should be referenced and followed.

Please note that all sub-contractors must submit their own health and safety plans to the DTSC for review. The document was reviewed for scientific content. Minor grammatical or typographical errors that do not affect interpretation have not been noted; however, these should be corrected in future versions of the document.

SPECIFIC COMMENTS

1. Section 4.5. Other Hazards, Bullet # 5. Potential heat stress was indicated (ambient temp >70 degrees Fahrenheit), please discuss its symptoms and the attendant hazards.

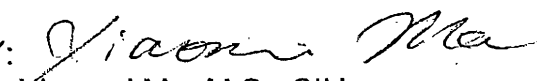
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2. Section 7.5. Training. Site personnel have the potential to wear a half-face air-purifying respirator due to inhalation hazard. Please refer to Cal/OSHA regulation for specific requirements such as medical evaluation, training, fit testing, etc.

CONCLUSIONS

The submitted documents require additional information and/or clarification of the issues identified above. Final revisions must be incorporated into the document in a comprehensive format, which allows site workers to readily access information within the documents. Should questions arise, please contact Mellan Songco at (916) 255-3590.

PEER REVIEW BY:


Xiaomei Ma, M.S., CIH
Associate Industrial Hygienist



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MEMORANDUM

TO: Leona Winner
Hazardous Substances Scientist
Standardized Permits and Corrective Action Branch
DTSC Sacramento Field Office

FROM: Paul Carpenter, CHG *Paul Carpenter*
Hazardous Substances Engineering Geologist
Geology and Corrective Action Branch
Geological Services Unit

CONCUR: Brian Lewis, CEG, CHG *Don Gearty for Brian Lewis*
Hazardous Substances Engineering Geologist Supervisor I
Geology and Corrective Action Branch
Geological Services Unit

DATE: October 18, 2002

SUBJECT: REVIEW OF REVISED RFI WORKPLAN, FORMER TRENT TUBE
FACILITY, FULLERTON, CALIFORNIA
Codes: 22120/ 400390-00 / 36-PER

Document Reviewed

Revised RCRA Facility Investigation Workplan, La Barron Investments, Fullerton California, prepared by FREY Environmental Inc., dated October 15, 2002 (Revised Workplan).

RECOMMENDATION

The Geological Services Unit (GSU) of the Department of Toxic Substances Control (DTSC) has reviewed the Revised Workplan, and concludes that the document has adequately addressed the recommendations in GSU's October 4, 2002 Memorandum reviewing the initial RFI Workplan (dated August 30, 2002). GSU recommends that the Revised Workplan be approved. If you have any questions, please contact Paul Carpenter at (916) 255-6534.

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